

**EXHIBIT B TO THE DECLARATION OF BRAD E. KONSTANDT
IN SUPPORT OF DEFENDANTS' MOTION FOR LEAVE
TO TAKE EXPERT DEPOSITIONS, DATED APRIL 1, 2013**

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BRIEFLY / WALL STREET
Indictment Accuses 15 of Investment Fraud

Fifteen former executives and employees of D.H. Blair & Co., a defunct Wall Street securities brokerage, were indicted on charges of defrauding investors out of tens of millions of dollars, partly by manipulating stock prices, in a scheme that ran from 1989 to 1998, the Manhattan district attorney's office said. The firm, which shut down in 1998, manipulated initial public offerings and other stocks, engaged in illegal and high-pressure sales tactics to generate excessive commissions, and sold shares at far more than prevailing market prices, according to the 173-count indictment. Those indicted included Kenton Wood, who was the firm's chairman, former Vice Chairmen Alan Stahler and Kalman Renov, former head trader Vito Capotorto, and 11 brokers who worked at D.H. Blair. In a statement, attorneys for the firm and its executives said they "are innocent of these charges."

---- Index References ----

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